

From: W Michael Oberfield <wmoberfield@renergy.com>  
Subject: Dovetail Notice Response  
Date: August 16, 2018 at 12:48:13 PM EDT  
To: Betsy VanWormer <betsy.vanwormer@epa.ohio.gov>  
Cc: Erin.Sherer@epa.ohio.gov

Ms. VanWormer,

Please find our response to the Dovetail notice dated July 14, 2018 (attached for convenience) immediately below.

1. The storage tank material level is being maintained with a 1' freeboard requirement. Working with the SWDO, we received confirmation that NRCS guidelines will apply to the storage tank in as built condition (allowing 1' of freeboard as opposed to the 2' previously recommended). As built engineered drawings of the tank have been submitted to Ohio EPA along with an NPDES Modification request. To my knowledge, all requested information related to this topic has been submitted to OEPA and the application is under review at SWDO. We anticipate maintaining material level with sufficient freeboard of greater than or equal to 1' moving forward. A picture showing current (8/16 at 1030am) level is attached.

*Excerpt from Ned Sarle, SWDO, email May 7, 2018: "You have provided justification for providing 1 foot of freeboard based on NCRS guidance. We have considered this proposed justification for maintaining 1 foot of freeboard and found this proposal acceptable."*

2. Daily hydraulic flow of 34,550 gallons was indicated as the average design rate of the Dovetail facility. Actual operational daily hydraulic flow rate capacity is significantly higher than average design rate as historically proven by exceptional and consistent volatile solids reduction performance at the Dovetail facility. Feedstock will continue to be managed to ensure ongoing system performance and regulatory compliance. We are actively working with OEPA to identify performance metrics that are more representative of process effectiveness. Once appropriate metrics are determined and permits are updated accordingly, feedstock management practices may be adjusted if needed.

Anaerobic digestion provides a sustainable alternative to sending organic waste to a local landfill or being discharged into public waterways.

Reenergy is committed to reducing harmful emissions in our communities by turning manure, food waste, and biosolids into energy.

For more information about our mission and tips on sustainability, visit [reenergy.com](http://reenergy.com).

Best,  
Mike

W. Michael Oberfield

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